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April 8, 2021


Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED.

SO ORDERED.

Dated: 4/9/2021

Re: United States v. Jazmyne Alyce Johns
19-cr-03 (PKC)


P. Kevin Castel
United States District Judge

Dear Judge Castel:

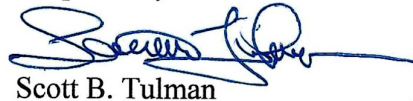
I write, with the Government's consent, to seek a three-day extension of the time for the Government to serve and file its pretrial submissions.

I was appointed on March 31, 2021 to represent Defendant Jazmyne Johns in the above matter as additional counsel for purposes of pretrial representation. (ECF Doc. No. 78 filed 03/31/21). During the Court appearance leading to my appointment, the Court directed the Government to identify Rule 404(b) evidence and file *in limine* motions, a proposed *voir dire*, and requests to charge by April 12, 2021. I request this time be extended to April 15, 2021.

Over the past week, I have consulted with trial counsel, reviewed the evidence, and consulted with the client and her mother on numerous occasions. It is apparent to me that a communication problem with trial counsel resulted in a situation where the Defendant questioned her decision to resolve this case pretrial. The parties are actively engaged in good faith efforts to resolve this case and significant progress has been made. I require additional time to provide effective assistance of counsel to my client so that she and her family are confident in the decisions she makes. The existing deadlines for pretrial submissions are hampering my ability to provide the effective assistance of counsel.

Accordingly, I respectfully seek this extension, with all other dates in the scheduling order remaining the same.

Respectfully submitted


Scott B. Tulman

SBT:ss

cc: Government Counsel